

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

**NIKI FRENCHKO**

Plaintiff,

-VS-

**PAUL MONROE, et al**

Defendants

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**Case Number:** 4:23-cv-00781

**Judge:** J. Phillip Calabrese

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**PLAINTIFF NIKI FRENCHKO'S *UNOPPOSED* MOTION FOR EXTENSION  
OF TIME TO FILE FEE PETITION**

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Plaintiff, Niki Frenchko, by and through counsel respectfully moves this Court for a thirty (30) day extension of time in which to file a Motion for Attorney Fees. As grounds for this Motion, on January 16, 2024, this Court entered a decision granting, in part, Plaintiff's Motion for Partial Summary Judgment. Specifically, in its 81-page Opinion and Order, this Court held that Plaintiff was entitled to judgement as a matter of law on her claims brought under 41 U.S.C. § 1983. (ECF No. 61).

As the prevailing party, Plaintiff is entitled to an award of attorney fees. Federal Rule 54(d)(2) provides that such motion must be filed no later than 14 days after entry of the judgment. Given the scope of this Court's Order, the complexities of this case, and the need to retain an expert, Plaintiff respectfully requests an extension of an additional thirty (30) days in which to file her motion for fees. Such extension would make Plaintiff's motion due on or before **Tuesday, February 29, 2024.**

This request for an extension is made in good faith and not sought for purposes of delay.

Respectfully Submitted,

**/s/ Matt Miller-Novak**

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***Attorneys for Plaintiff***

**CERTIFICATE OF SERVICE**

I certify that I served notice of this subpoena on Defendants' Counsel via this Court's electronic filing notification system on January 21, 2024.

**/s/ Matt Miller-Novak**